

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | |
| |) | CRIMINAL NO. 04-10060-RCL |
| GEORGE SCHUSSEL, |) | |
| Defendant |) | |

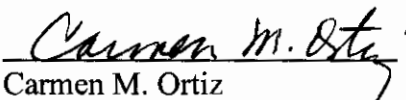
MOTION TO SEAL

The United States of America hereby moves this Honorable Court to issue an order maintaining under seal the Government's Opposition to Defendant's Sentencing Memorandum, filed today, which includes some attachments of excerpts from transcripts relating to the testimony of Ronald Gomes and Edward DeFranceschi from the pretrial hearings that were conducted under seal. Also included is a portion of Paul Law's grand jury testimony and a document that was subject to a pretrial motion to suppress. As grounds for this motion to seal, the government states that the attached response contains excerpts of testimony from a sealed proceeding, as well as grand jury testimony. To prevent any disclosure of grand jury material and information currently under seal as contained in these materials, the government requests that this Honorable Court maintain the attached documents under seal.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


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